



November 22, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Amendment to ATIS Hearing Aid Compatibility Status Report #4  
WT Docket No. 01-309

Dear Ms. Dortch:

On November 17, 2005, the Alliance for Telecommunications Industry Solutions ("ATIS") Incubator Solutions Program 4 -- Hearing Aid Compatibility ("AISP.4-HAC"), filed its fourth status report on the efforts of the wireless industry to comply with the Commission's hearing aid compatibility ("HAC") rules. Attachment A1 of AISP.4-HAC's report included individual HAC compliance reports from wireless carriers and manufacturers that participate in the AISP.4-HAC. Unfortunately, a portion of the report submitted by SunCom Wireless, Inc. was inadvertently omitted from Attachment A1. Attached hereto is SunCom Wireless, Inc.'s complete "Status Report on Hearing Aid Compatibility."

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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Thomas Goode  
Associate General Counsel  
The Alliance for Telecommunications  
Industry Solutions  
1200 G Street NW  
Suite 500  
Washington, DC 20005  
Phone: (202) 434-8830

Attachment

## Status Report on Hearing Aid Compatibility

(as of November 1, 2005)

### Section 1. Company Information

<i>a. Company Name:</i> <b>SunCom Wireless, Inc.</b>		<i>b. Contact Name:</i> Charles Kallenbach
<i>c. Address:</i> 1100 Cassatt Road		
<i>d. City:</i> Berwyn	<i>e. State:</i> PA	<i>f. Zip Code:</i> 19312
<i>g. Phone:</i> 610-722-4280	<i>h. Fax:</i> 610-722-4488	<i>i. Email:</i> ckallenbach@suncom.com

### Section 2. Compliant Phone Model Information

*a. Compliant Phone Models:*

Model	Band(s)	Air Interface(s)	ANSI C63.19 Rating	FCC ID	Grant Type
Motorola V220	800/1900	GSM	M3	IHDT56ER1	Class 2 w/ Waiver
Motorola V3	800/1900	GSM	M3	IHDT56EU1	Class 2 w/ Waiver

*b. Total Number of Compliant Models:* 2

*c. Total Number of Models (US):* 29

### Section 3. Product Labeling Information

On September 14, 2005, SunCom filed a request for temporary waiver of the Commission's HAC rules, due to the unavailability of HAC-certified dual-band GSM handsets. On October 14, 2005, due to recent HAC certifications resulting from the Commission's waiver order for dual-band GSM handsets (FCC 05-166), SunCom revised its waiver request to seek a shorter compliance extension, until December 1, 2005. In support of its requested extension, SunCom explained that it needed time, in part, to receive and distribute the appropriate product labeling materials which it expected to receive from the handset manufacturer. SunCom is currently in the process of ensuring that the labels and package inserts are received from its vendors and are distributed to SunCom's retail locations prior to December 1.

#### Section 4. Consumer Outreach Efforts

SunCom is currently planning a revision of its website which will include consumer information on HAC and will indicate which handsets available for purchase are HAC-certified.

For its retail stores, SunCom is in the process revising the handset display cards associated with SunCom's two HAC-certified models. The revised cards will indicate that the handsets satisfy the M3 HAC rating, thereby making it possible for customers to identify readily which handsets are hearing aid compatible.

SunCom is committed to a flexible return policy for hearing aid users who purchase a M3-compliant handset. SunCom currently has a 15-day return policy for its stores in the mainland U.S., but offers a 30-day policy for its stores in Puerto Rico. SunCom is in the process of determining how to transition to a 30-day policy for these customers in all of its stores.

#### Section 5. Retail Availability of Compliant Models

Both HAC-certified handset models are available on SunCom's website and in the vast majority of SunCom's retail stores. SunCom is in the process of identifying any stores that may still lack availability of either handset. SunCom expects to complete this process prior to the December 1 extension date sought in its pending waiver request.

#### Section 6. Efforts to Incorporate Hearing Aid Compatibility into New Models

SunCom must rely on manufacturers to incorporate hearing aid compatibility into new models. SunCom will continue to seek information from manufacturers and/or their distributors regarding the future availability of handsets that comply with the HAC rules, including the requirement to satisfy the M3 standard at 850 MHz.

#### Section 7. Activities Related to ANSI C63.19 or Other Standards

SunCom is a member of the ATIS HAC Incubator (AISP.4-HAC), which is actively involved in assessing and recommending changes to the ANSI C63.19 standard. Also, as noted above, SunCom will continue to seek information from its vendors regarding the availability of handsets that satisfy the Commissions rules, including the requirement to conform to ANSI C63.19.

## Section 8. Efforts to Test Interoperability With Hearing Aids

SunCom expects handset testing to be performed by the manufacturers.

## Section 9. Information Regarding Differences in Handset Offerings Among Regions in Service Areas (Service Providers Only)

None.

## Section 10. Statement of Waiver and Status of Efforts Towards Compliance (Vendors or Service Providers who availed themselves of the FCC 05-166 *Memorandum Opinion and Order* released September 8, 2005)

Because the two HAC-certified handsets being offered by SunCom satisfy the M3 rating only for the 1900 MHz band, SunCom is availing itself of the relief provided in the Commission's waiver order (FCC 05-166) issued September 8, 2005. SunCom's efforts towards compliance are described above in Sections 4 and 6.